



CASSELS BROCK  
LAWYERS

RECEIVED BY

OCT 10 2019

CITY OF LONDON  
DEVELOPMENT SERVICES

October 9, 2019

Registered Mail & Courier

Secretary of the Property Stands Committee  
c/o Development & Compliance Services  
City Hall  
P.O. Box 5035  
London, ON N6A 4L9

sleisk@casselsbrock.com

tel: 416.869.5411

fax: 416.640.3218

file #39746-14

Dear Sir/Madam:

**Re: Appeal of Property Standards Order Number PV 19-035617 (the "Order");  
75 Ann St., London ON**

We are the solicitors for Centurion Apartment Properties (75 Ann) Inc. ("Centurion"), the owner of the above noted property. We hereby appeal the above noted Order for the following, among other, reasons.

Centurion acquired the property on February 27, 2012, from Varsity Commons Housing Inc. At the time of acquisition, the property was fully developed with permits issued from the City of London and operated as rental accommodation primarily to students. At this time, individual bedrooms were being rented to students, including the interior bedrooms at issue in the Order herein. To ensure compliance with all applicable laws, as part of its due diligence Centurion requisitioned the City of London to ensure legal compliance. On December 14, 2011, Centurion received confirmation from the City that there were no outstanding orders under the Building Code, Property Standards By-law, and no outstanding permits. On this basis, and as the bedrooms were already tenanted, Centurion assumed all existing leases and continued operating the property consistent with past practice.

At no time since acquisition of the property has Centurion altered the existing units, created additional bedrooms or modified existing bedrooms. Centurion was therefore surprised to receive the Order, given its understanding that the property had been constructed and operated in accordance with all applicable laws. Centurion prides itself in offering well maintained, clean and safe accommodations. Upon receipt of the Order, it immediately commenced discussions with City staff to determine an acceptable solution to ensure compliance. Centurion and City staff continue to work together to resolve all repairs to be made, however the required alterations are significant and cannot be accomplished while the units are tenanted. It is also not possible to complete these repairs within the mere three weeks provided by the Order. As a result, we are appealing the date of conformance and request that this date be extended until August 31, 2020, to allow the repairs to take place during the summer when the majority of students have vacated the units to ensure as little tenant displacement/disruption as possible.




October 9, 2019  
Page 2

Please find enclosed the requisite appeal fee.

Yours truly,

Cassels Brock & Blackwell LLP

  
Signe Leisk  
SL/nv  
Encl.